

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

MEMORANDUM

9/12/2019

**SUBJECT:** Product Chemistry Review for CRB,  
EPA Reg. No.: 5813-120, DP 453995

**FROM:** SRodriguez, chemist  
Product Science Branch, CT Team  
Antimicrobials Division (7510P)

**THRU:** Karen Hicks, Team Leader  
Product Science Branch  
Antimicrobials Division (7510P)

**TO:** Demson Fuller, PM Team 32 / Wanda Henson  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Registrant: The Clorox  
Co.

Action code: 575

Agency Due Date:  
11/30/2019

Science Due Date:  
9/21/2019

Submission No.: 1038712

E-Sub No.: 41815

Classification: EP

Process: Nonintegrated  
system

Pesticide classification:  
Antimicrobial & Sanitizer

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
014703	7681-52-9	Sodium Hypochlorite	7.50

Na<sup>+</sup>



## I. BACKGROUND

The Registrant, The Clorox Co., has submitted the OPPTS Guideline Series 830.6317 & 830.6320 in support for their product: **CRB** EPA Reg. No. 5813-120. This product kills parasites, fungi or their spores and inhibits their growth of bacteria as disinfectants, antiseptics or antibiotics and kills or irreversibly inactivates at least 99.9 % of bacteria, fungi & viruses

## II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-1 – Application for Pesticide Registration	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EPA FORM 8570-27 – Formulator's Exemption Statement	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EPA FORM 8570-34 – Certification with respect to citation of data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EPA FORM 8570-35 – Data Matrix (8/9/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Cover letter (8/9/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transmittal document	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Proposed CSF: N/A	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Proposed label, (7/25/2019)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Certification for Pilot Fragrance Notification Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
REFERENCED: Basic CSF, dated 8/9/18	--	

## III. FINDINGS

### CONFIDENTIAL STATEMENT OF FORMULA

#### a. Product Formulation:

	TGAI	MUP	<i><b>EUP</b></i>	Food use	<i><b>Non-food use</b></i>
<i><b>Non-integrated</b></i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Active Ingredients(s)			Nominal	Upper limit	Lower limit
Sodium Hypochlorite			7.50	9.45	5.17

	Acceptable	Not Acceptable	N/A
1. The certified limits of all ingredients are within 40 CFR standard certified limits.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Wider certified limits were requested, and rationale was accepted.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. The nominal concentration(s) of the active ingredient is in agreement with the label.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. All inert ingredients are approved for non-food use pesticide formulations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. The impurities present >0.1% are identified.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Impurities of toxicological significance have an upper certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

b. Product Label:

	Yes	NO	N/A
<i>The formula contains one of the following:</i>			
1. 10% or more of petroleum distillate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. 1.0% or more of methyl alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Sodium nitrite at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. A toxic list 1 inert at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Arsenic in any form	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. If yes to 2-6, then the inert ingredient list contains a relevant footnote	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. The storage and disposal instructions for the pesticide container follow PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**IV. Conclusion:** Product Science Branch of Antimicrobials Division finds the proposed OPPTS Guideline Series 830.6317 "Storage stability" & 830.6320 "Corrosion characteristics" studies, supporting the antimicrobial & sanitizer, non-integrated, non-food use, end-use product EPARN:

**5813-120 to be acceptable**

**V. Table B: Series 830 guidelines – Group B**

OPPTS#	Name	Study Findings/Comment	Status	MRID
830.6317	Storage stability	Product is stable	Acceptable	50914801
830.6320	Corrosion characteristics	Container is stable	Acceptable	50914801